

From: [Rinaldi, Gerald M](#)
To: [Smith, Clarence](#)
Cc: [Smith, Steven D](#); Steve.Nightingale@illinois.gov; [Carson, Robert](#); [Tanaka, Joan](#); [Watson, Rob](#); [Lake, Paul](#); [Linebaugh, Stephanie Ball](#); [Bardo, Kenneth](#)
Subject: RE: Solutia, Sauget, IL - Remedial Action Plan Permit - Call Week of 2/25 - 3/1
Date: Thursday, February 21, 2013 10:37:09 AM

Solutia is anxious to hear what the agencies have to say. Steve Smith and I would be available as follows:

Tuesday, 2/26, all day
Thursday, 2/28, all day
Friday, 3/1, morning only

I have added Stephanie Linebaugh - US EPA CERCLA and Ken Bardo - US EPA RCRA to "cc" on this e-mail in anticipation that they would participate and so they can respond with their availability.

Jerry

-----Original Message-----

From: Smith, Clarence [<mailto:Clarence.Smith@illinois.gov>]
Sent: Wednesday, February 20, 2013 4:45 PM
To: Rinaldi, Gerald M; Smith, Steven D
Cc: Nightingale, Steve; Carson, Robert; Joan Tanaka (Tanaka.Joan@epamail.epa.gov); Watson, Rob; Lake, Paul
Subject: RE: Solutia, Sauget, IL - Remedial Action Plan Permit
Importance: High

Mr. Rinaldi:

Illinois EPA and USEPA had a discussion regarding the use of the Judith Land Landfill Cell that is a part of the Sauget Area 1 Proposed NPL site, and we have identified a path forward that would be mutually acceptable to both USEPA and Illinois EPA.

We would like to schedule a conference call with Solutia to discuss this matter so that we can move the project forward. I would suggest we try and have the call the week of February 25, 2013 if possible. Monday and Wednesday afternoon of that week I am unavailable, but open the rest of the time. Please provide me with a couple of dates and times and I will try and schedule a call.

If you should have any questions, need any additional information, or would care to discuss this matter further, please let me know.

Respectfully,

CLS

Clarence L. Smith, Manager
Federal Site Remediation Section
Division of Remediation Management
Bureau of Land

Illinois Environmental Protection Agency
1021 North Grand Avenue, East
Post Office Box 19276
Springfield, Illinois 62794-9276

217-524-1655

-----Original Message-----

From: Smith, Clarence

Sent: Friday, February 15, 2013 3:23 PM

To: 'Rinaldi, Gerald M'

Cc: Smith, Steven D; Nightingale, Steve; Joan Tanaka (Tanaka.Joan@epamail.epa.gov)

Subject: RE: Solutia, Sauget, IL - Remedial Action Plan Permit

Importance: High

Mr. Rinaldi:

I have not had the opportunity to fully discuss this matter after our last conference call with my counterpart at USEPA, Joan Tanaka.

As soon as that conversation occurs, I will be in touch.

Respectfully,

CLS

Clarence L. Smith, Manager
Federal Site Remediation Section
Division of Remediation Management
Bureau of Land

Illinois Environmental Protection Agency
1021 North Grand Avenue, East
Post Office Box 19276
Springfield, Illinois 62794-9276

217-524-1655

-----Original Message-----

From: Rinaldi, Gerald M [<mailto:gmrina@solutia.com>]

Sent: Friday, February 15, 2013 10:36 AM

To: Smith, Clarence

Cc: Smith, Steven D; Nightingale, Steve

Subject: RE: Solutia, Sauget, IL - Remedial Action Plan Permit

On 1/29/13, I called you to discuss my 1/18/13 e-mail below. You told me that you had left a message (just after my 1/9/13 conference call with you et al. at IEPA?) for Joan Tanaka-US EPA CERCLA and were waiting to hear back.

On 1/30/13, Steve Smith, Solutia's CERCLA Project Manager, again spoke to Stephanie Linebaugh, US EPA CERCLA Project Manager on Ms. Tanaka's staff, and she confirmed what she'd said in their 1/16/13 discussion, i.e., that US EPA CERCLA would accept Krummrich Plant material being placed in the Judith Lane cell, provided the cell would be regulated under RCRA from the time that additional material was placed (as stated in my e-mail below). Ms. Linebaugh added that Ms. Tanaka was aware of that position.

Could you please provide an update and any suggestions on how Solutia can move this project forward?

Thanks,

G. M. (Jerry) Rinaldi - 2S
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Phone 314-674-3312

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-----Original Message-----

From: Rinaldi, Gerald M
Sent: Friday, January 18, 2013 3:09 PM
To: NIGHTINGALE, STEVE - IEPA; clarence.smith@illinois.gov
Cc: Smith, Steven D
Subject: RE: Solutia, Sauget, IL - RAPP - Follow-Up Call

I'm sorry we weren't able to talk today. Here's what I wanted to share:

- US EPA Region 5 RCRA and CERCLA representatives continue to support placing material from the Krummrich Plant into the Judith Lane cell, provided the cell would be regulated under RCRA from the time that additional material was placed, i.e., not "returning" to CERCLA after that placement.

- On a related note, which I may not have communicated in our 1/9 call, Solutia would be amenable to the cell so becoming, and remaining, regulated under RCRA.

If, on behalf of IEPA RCRA and CERCLA, you conceptually agree with the above, perhaps we could skip the technical-contacts-only discussion that we said in our 1/9 call would be the next step and move to asking for the company's and the federal and state agencies' lawyers' assistance in determining the appropriate paperwork to move forward in the manner I've generally described above.

I look forward to your responses. Please let me know if you'd like to have a call among the three of us, as I proposed yesterday, to discuss.

Jerry

-----Original Message-----

From: Rinaldi, Gerald M
Sent: Thursday, January 17, 2013 6:41 AM
To: NIGHTINGALE, STEVE - IEPA; clarence.smith@illinois.gov
Cc: Smith, Steven D
Subject: Solutia, Sauget, IL - RAPP - Follow-Up Call

On 1/9, I spoke with you and others at IEPA about this subject.

On 1/11, I reviewed that discussion with Ken Bardo, US EPA Region 5 RCRA Project Manager for the Krummrich Plant RCRA corrective action.

Yesterday Steve Smith, Solutia's CERCLA Project Manager, did likewise with Stephanie Linebaugh, US EPA Region 5 CERCLA Project Manager for the Sauget Area 1 and 2 Superfund sites.

Pursuant to those conversations, I'd like to speak to the two of you about the path forward. I propose we talk tomorrow Friday, 1/18, at 1:00 (if unavailable, please propose other times that day or Tuesday, 1/22). Call 888-651-5908 and enter 507910 to participate.

Thanks,

Jerry Rinaldi
Remediation Services Manager
Solutia Inc.
Office (314) 674-3312

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